

Jacquelyn H Choi (SBN 211560)  
RIMON, P.C.  
2029 Century Park East, Suite 400N  
Los Angeles, California 90067-2905  
Telephone: (310) 525-5859  
Facsimile: (310) 525-5859  
Email: [jacquelyn.choi@rimonlaw.com](mailto:jacquelyn.choi@rimonlaw.com)

Attorneys for Plaintiffs, **THE PEOPLE OF THE  
STATE OF CALIFORNIA**, by and through  
**GEORGE GASCÓN**, Los Angeles County  
District Attorney, **COUNTY OF LOS ANGELES**  
and **LOS ANGELES COUNTY DEPARTMENT  
OF PUBLIC HEALTH ACTING AS THE  
LOCAL ENFORCEMENT AGENCY**

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**SAN FERNANDO VALLEY DIVISION**

In re  
ANDREA LYNN MURRAY,  
Debtor.

Case No. 1:21-bk-11781-MT  
Chapter 7

THE PEOPLE OF THE STATE OF  
CALIFORNIA, by and through GEORGE  
GASCÓN, Los Angeles County District  
Attorney, COUNTY OF LOS ANGELES and  
LOS ANGELES COUNTY DEPARTMENT  
OF PUBLIC HEALTH ACTING AS THE  
LOCAL ENFORCEMENT AGENCY,

Adv No. 1:22-ap-01010-MT

**STIPULATION FOR ENTRY OF ORDER  
CONTINUING MEDIATION  
CONFERENCE**

Status Conference:  
Date: May 15, 2023  
Time: 10:00 a.m.  
Place: Courtroom 302  
United States Bankruptcy Court  
21041 Burbank Boulevard  
Woodland Hills, CA 91367

Plaintiffs,  
v.  
ANDREA LYNN MURRAY, and DOES 1-  
10;  
Defendants.

[NO HEARING REQUIRED]

**TO THE HONORABLE MAUREEN A. TIGHE, UNITED STATES BANKRUPTCY  
JUDGE AND ALL PARTIES IN INTEREST:**

1 This *Stipulation For Entry of Order Continuing Mediation Conference* (the “**Stipulation**”), is  
2 entered into by and between the above-captioned Defendant, Andrea Lynn Murray (the  
3 “**Defendant**”), on the one hand, and The People of the State of California (the “**People**”), by and  
4 through George Gascón, Los Angeles County District Attorney, the County of Los Angeles (the  
5 “**County**”) and Los Angeles County Department of Public Health Acting as the Local Enforcement  
6 Agency (“**LEA**”) (collectively, the “**Plaintiffs**”), on the other hand (collectively, the “**Parties**”), with  
7 regard to the following facts and recitals:

8 **RECITALS**

9 A. On October 27, 2021 (the “**Petition Date**”), the Debtor filed a voluntary petition  
10 under chapter 7 of Title 11 of the United States Code.

11 B. On February 4, 2022, the Plaintiffs commenced an adversary proceeding (the  
12 “**Adversary Proceeding**”) by filing a *Complaint For Determination Of Non-Dischargeable Debts*  
13 *Pursuant To 11 U.S.C. § 523(a)(6) and 523(a)(7)* (the “**Complaint**”) [Adv. Docket No. 1].

14 C. On February 14, 2022, the Debtor obtained a discharge under 11 U.S.C. § 727 and  
15 the Debtor’s bankruptcy case was closed.

16 D. On June 28, 2022, the Court entered an *Order Assigning Matter to Mediation*  
17 *Program and Appointing Mediator and Alternate Mediator* (the “**Mediation Order**”) [Adv. Docket  
18 No. 13]. Sandra J. Coleman, Esq. was appointed as the mediator (the “**Mediator**”) and Holly  
19 Walker, Esq. was appointed as the alternate mediator. The Parties agreed to attend mediation (the  
20 “**Mediation Conference**”) on December 9, 2022 (the “**Current Mediation Date**”) with the  
21 Mediator.

22 E. Since the entry of the Mediation Order, the County and the People commenced  
23 good-faith settlement negotiations with the Defendant which resulted in an informal settlement  
24 agreement. The Parties are in the process of memorializing the terms of the settlement into two (2)  
25 separate stipulations for entry of judgments to be presented to the Court for approval.

26 F. On May 25, 2022, in the criminal action commenced by the People against the  
27  
28

1 Defendant pending in the Los Angeles County Superior Court for the State of California (Case No.  
2 SC05143) (the “**Criminal Action**”), the criminal court dismissed Counts 6, 7, 9 and 12 filed against  
3 the Defendant and further held that the People could retry Count 1 (Unpermitted Grading), Count 4  
4 (Improperly Placing Fill Material), and Count 8 (Unlawful Land Use - Unpermitted Solid Fill  
5 Project). On November 3, 2022 (after a retrial), the jury reached verdicts, declaring a mistrial as to  
6 Count 8, but finding the Defendant guilty of misdemeanor Counts 1 (Unpermitted Grading) and 4  
7 (Improperly Placing Fill Material).

8 G. On December 8, 2022, the criminal court sentenced the Defendant on convictions for  
9 Counts 1 and 4 (“**Defendant’s Sentencing**”). With regard to Defendant’s Sentencing, the criminal  
10 court imposed certain fines and/or community labor upon Defendant as set forth in a Minute Order  
11 dated December 12, 2022.

12 H. With respect to the LEA’s Case & Desist Order, which was appealed by the  
13 Defendant to CalRecycle prior to the Petition Date (the “**Defendant’s CalRecycle Appeal**”), the  
14 appellate hearing was continued pending the outcome of the Criminal Action. At the status  
15 conference on December 7, 2022, the Defendant advised the CalRecycle hearing officer that she  
16 needed additional time for briefing. On or around January 10, 2023, the following briefing  
17 deadlines were established:

- 18 (i) February 3, 2023 – Deadline for Defendant’s opening brief;  
19 (ii) February 16, 2023 – Deadline for LEA’s responsive brief; and  
20 (iii) March 2, 2023 – Deadline for Defendant’s reply (if any).

21 I. Given that a decision on Defendant’s CalRecycle Appeal is not expected to be  
22 rendered until sometime after March 2, 2023, the Parties believe there is “good cause” to extend the  
23 Current Mediation Date to March 17, 2023 (the “**Continued Mediation Date**”), which date has  
24 been approved in advance by the Mediator.

25 WHEREFORE, in a good faith effort to attempt to settle the underlying causes of action set  
26 forth in the Complaint through Mediation, the Parties have agreed to continue the Current Mediation  
27  
28

1 Date to the Continued Mediation Date of March 17, 2023.


2 **STIPULATION**

3 NOW THEREFORE, it is hereby stipulated by and between the Parties, subject to Court  
4 approval, as follows:

5 1. The Parties hereby stipulate to continue the Current Mediation Date of December 9,  
6 2022 to the Continued Mediation Date of March 17, 2023.

7  
8 Dated: January 25, 2023

**RIMON, P.C.**

9  
10 By:  \_\_\_\_\_  
11 Jacquelyn H. Choi  
12 Attorneys for Plaintiffs

13 Dated: January \_\_, 2023

**ANDREA LYNN MURRAY**

14  
15 By: \_\_\_\_\_  
16 Andrea Lynn Murray  
17 Defendant Pro Se  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 Date to the Continued Mediation Date of March 17, 2023.

2 **STIPULATION**

3 NOW THEREFORE, it is hereby stipulated by and between the Parties, subject to Court  
4 approval, as follows:

5 1. The Parties hereby stipulate to continue the Current Mediation Date of December 9,  
6 2022 to the Continued Mediation Date of March 17, 2023.

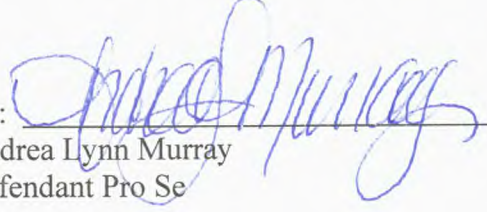
7  
8 Dated: January \_\_, 2023

**RIMON, P.C.**

9  
10 By: \_\_\_\_\_  
11 Jacquelyn H. Choi  
12 Attorneys for Plaintiffs

13 Dated: January 24, 2023

**ANDREA LYNN MURRAY**

14  
15 By:  \_\_\_\_\_  
16 Andrea Lynn Murray  
17 Defendant Pro Se  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
3579 4th Ave., San Diego, CA 92103

A true and correct copy of the foregoing document entitled (*specify*): Stipulation for Entry of Order Continuing Mediation Conference

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 01/25/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

United States Trustee: ustregion16.wh.ecf@usdoj.gov

Standing Trustee: Nancy J. Zamora, zamora3@aol.com, nzamora@ecf.axosfs.com

Other Parties in Interest: Raymond H. Aver, ray@averlaw.com, averlawfirm@gmail.com; ani@averlaw.com; kayta@averlaw.com; jesús@averlaw.com

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) 01/25/2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Andrea Lynn Murray, and DOES 1-10

PO Box 3155

Chatsworth, CA 91313

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) 01/25/2023, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

By Email:

Andrea Murray, bcr2003@aol.com

Mediator, Sandra J. Coleman, Esq., sandra.coleman@sbcglobal.net

Alternate mediator, Holly Walker, Esq., holly@veruslawgroup.com

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

01/25/2023      Esteban Garcia  
*Date*                      *Printed Name*

/s/ Esteban Garcia  
*Signature*